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DATE: 10 March 2016

**RE: Lostine Corridor Public Safety Project - scoping**

Please accept the following scoping comments from Oregon Wild regarding the proposed Lostine Corridor Public Safety Project. Oregon Wild represents approximately 15,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

This project involves:

- removal of hazard trees;
- creation of defensible space around infrastructure;
- reduction of canopy, surface, and ladder fuels to reduce the risk of high severity fire;
- thin dense forest to improve health and resilience;

We urge the FS to use a very light touch with this project.

The Lostine River Corridor is one of the most important places on the Wallowa-Whitman National Forest. It is a narrow cherry stem surrounded by wilderness. This corridor access popular trailheads and camping areas. This scenic recreation corridor is close to population centers of the Wallowa Valley and is important to their economic diversity and vitality. The narrow valley bottom is surrounded by steep slopes making it disproportionately important for a variety of wildlife (including numerous rare plants). This river itself is important for Chinook and other fish as well as the human communities that appreciate these fish.

The Lostine River is designated as Wild and Scenic. The lower 11 miles are designated as recreational (however, the west side of the river is in wilderness and shall be managed as a wild river). The outstandingly remarkable values for the Lostine River include: scenery, recreation, fisheries, wildlife, and vegetation/botany. <http://www.rivers.gov/documents/plans/lostine-plan.pdf>

The river corridor supports a diversity of wildlife habitats and species, including Rocky Mountain elk, deer, black bear, mountain lion, beaver, otter, mink and other small mammals. Rocky Mountain bighorn sheep, indigenous to the Eagle Cap Wilderness, have been reintroduced in the Hurricane Creek-Lostine River drainage. Peregrine falcons, bald eagles and a large variety of other birds inhabit the area. The river supports spring and fall Snake River Chinook salmon (listed as threatened under ESA), steelhead and bull trout.

The unique area is home to numerous proposed, endangered, threatened and sensitive (PETS) species of plants. These include 11 species of moonwort and the northern twayblade. The rarity

of finding so many moonworts in one locality provides the opportunity for scientific research and a delight for botanists.

<http://www.rivers.gov/rivers/lostine.php>

The scoping notice says that this project will emphasize public safety while reducing effects on other resource values. We suggest that the FS consider an alternative framing of this project's purpose. The FS should *harmonize* the diverse and important values associated with this project area. Safety should not trump other values, but instead safety goals should be sought to the extent they are compatible with other important values.

The FS has a duty to protect and enhance outstandingly remarkable values. Within the framework of the Wild & Scenic River Act, protecting public safety is part of the recreational outstandingly remarkable value. Notably, the wild & scenic river plan has a conflict resolution clause which puts recreation *after* all of the other values. This means that the FS should err on the side of conserving natural values when designing and implementing this project. Use a light touch.

**Conflict Resolution.** If conflicts arise between OR values which cannot be resolved within the direction of the Act or management plan, then they shall be resolved according to the following priorities: 1) Fisheries, 2) Vegetation/Botanic 3) Wildlife, 4) Scenic, and 5) Recreation.

1993 Lostine River Plan at page 5.

The Lostine River Plan says that effort to address fire hazard must be "in line" with protection and enhancement of outstandingly remarkable values. Thus fuel reduction cannot trump wild & scenic river values.

**Complete a fire hazard analysis for the Recreational river segment by January 30, 1994. Implement those recommendations that are in line with the management plan and protect and enhance OR values.**

1993 Lostine River Plan at page 7.

The FS should consider various ways to managing safety hazards. They can reduce or eliminate the hazard itself, or they can manage people to reduce or eliminate the human hazard. This is supported in the Lostine River Plan:

**Consider a specific fire closure order for the river corridor or sections of the river corridor during the peak fire season.**

**Implement an educational program which may include posters, bulletin boards, prevention personnel, or other effective means to inform the public.**

The Lostine River Plan (p 12) emphasizes "thinning from below" that does "not rely on the use of heavy equipment on site." Fuel reduction should focus on surface and ladder fuels.

The FS should NOT focus on removal of canopy fuels. Canopy fuels present a low hazard, and they actually help moderate severe fire effects by helping to maintain a cool-moist-less-windy microclimate, and by suppressing the establishment and growth of surface and ladder fuels. Canopy fuel are also an important component of the scenic and habitat values of the corridor.

The River Plan calls for a 50-200 foot "fish management zone" with minimal vegetation management, adjacent to all waterbodies.

We urge the FS to focus on trees that pose an imminent hazard to high use areas. Trees that are more than 150 feet from the road, or leaning away from the road, are not generally a significant hazard. The FS must carefully balance the competing values when hazard trees are identified in the RHCA. Large hazard trees should not be removed. Large wood is not a significant fire hazard but large wood does provide significant value to fish and wildlife.

In this corridor, the FS should consider public education about the importance of evacuating in the event of fire.

The scenic ORV emphases "retention and preservation" of vegetation. 1993 Lostine River Plan at page 10. This indicates the need for a light touch approach to reducing fuels. The River plan adopted a 1992 viewshed corridor plan. The FS should post this on the website.

The FS should protect the aquatic and terrestrial habitat values associated with the PACFISH Riparian Habitat Conservation Area. Fuel treatments should focus on the side of the road opposite the river. Treatments between the road and the river should be very minimal.

Sincerely,  
/s/

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Oregon Wild's mission is to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations.